

SECURITIES COMMISSIONER
for the State of Maryland
200 St. Paul Place
Baltimore, Maryland 21202

Plaintiff,

v.

JOHN H. WILLIAMS
210 Queen Marie Ct.
Upper Marlboro, MD 20774

LAJON CAPITAL FUND, LP
9500 Arena Drive, Suite 420
Springdale, MD 20774-3716

LAJON CAPITAL ADVISORS, LLC
9500 Arena Drive, Suite 420
Springdale, MD 20774-3716

LAJON CORPORATION
210 Queen Marie Ct.
Upper Marlboro, MD 20774

and

LAJON CAPITAL MANAGEMENT, LLC
9500 Arena Drive, Suite 420
Springdale, MD 20774-3716

Defendants.

* * * * *

COMPLAINT

SUMMARY OF THIS ACTION

1. Plaintiff Securities Commissioner for the State of Maryland (the “Commissioner”), by her attorneys Douglas F. Gansler, Attorney General, and Assistant Attorneys General Katharine M. Weiskittel and Lucy A. Cardwell, complains that defendants John H. Williams (“Williams”),

LaJon Capital Fund LP, (the “Fund”) LaJon Capital Advisors, LLC (“Adviser”), LaJon Corporation (“Corporation”) and LaJon Capital Management, LLC (“Management”) (collectively the “defendants”) engaged in a scheme to defraud in connection with hedge fund investments through the Fund and ChartCandle, Inc. (“ChartCandle”).

2. The Fund and ChartCandle describe themselves as hedge funds that invest in other hedge funds, or as a “fund of funds”. The Fund and ChartCandle claim to engage in a diversified investment strategy utilizing a multi-manager, multi-strategy approach to investing in securities.

3. Between April 2006 and December 2006, Williams and Management sold to more than 90 investors over \$5.9 million worth of limited partnership interests in the Fund. Between June 2005 and May 2006, Williams and Corporation sold to more than 50 investors raised over \$3.9 million worth of ChartCandle’s promissory notes and limited partnership interests.

4. Most of the money raised by Williams and his companies has been dissipated through unsuccessful trading strategies, repayments to investors of principal and alleged profits, and fees paid to Williams and his companies.

5. No defendant has ever been registered with the Division of Securities (the “Division”) as a broker-dealer, broker-dealer agent, investment adviser, or investment adviser representative.

6. By engaging in the conduct described in this Complaint, defendants have violated Sections 11-301, 11-302, 11-303, 11-401, 11-402, and 11-501 of the Maryland Securities Act, Title 11, Md. Code Ann, Corps. & Ass’ns. (1999 Repl. Vol. and Supp. 2006) (the “Act”). Pursuant to Section 11-702 of the Act, the Commissioner brings this action to seek injunctive relief, a freeze of assets, appointment of a receiver, an order of restitution, and civil monetary penalties.

7. The Commissioner deems it appropriate and in the public interest that this action be

instituted to seek the requested relief.

JURISDICTION AND VENUE

8. This Court has jurisdiction over the subject matter of this action pursuant to Section 11-702 of the Act, which authorizes the Commissioner, in her discretion, to bring an action to enjoin any act or practice that constitutes a violation of any provision of the Act or any rule or order under the Act, and to enforce compliance with the Act. Section 11-702(b) of the Act authorizes the Commissioner to seek a temporary restraining order, a preliminary and permanent injunction, a freeze of assets, appointment of a receiver, an order of restitution, civil monetary penalties and such other relief as the Court deems just.

9. This Court has personal jurisdiction over the defendants pursuant to Md. Code Ann., Cts. & Jud. Proc. §6-102(a) (2005 Repl. Vol. and Supp. 2006). Venue is properly in this Court pursuant to Md. Code Ann., Cts. & Jud. Proc. §6-201.

PLAINTIFF

10. Plaintiff is the Securities Commissioner for the State of Maryland, acting pursuant to the authority granted her under Sections 11-101 *et seq.* of the Act to administer and enforce the Act's provisions. Plaintiff is the principal executive officer of the Division of Securities in the Office of the Attorney General, as set forth in Section 11-201(b) of the Act.

DEFENDANTS

11. Defendant Williams resides in Upper Marlboro, Maryland. Williams is a principal, founder, and chief operating officer of Management.

12. Defendant Fund conducts business from Largo, Maryland and New York, New York. The Fund is a New York limited partnership.

13. Defendant Adviser conducts business from Largo, Maryland and New York, New York. Adviser, a New York limited liability company controlled by Williams, is the investment adviser to the Fund.

14. Defendant Corporation conducts business from Largo, Maryland. Corporation was a Nevada corporation controlled by Williams. Corporation's corporate status is in default.

15. Defendant Management conducts business from Largo, Maryland and New York, New York. Management, a New York limited liability company controlled by Williams, is the general partner of the Fund.

STATEMENT OF FACTS

ChartCandle Offering

16. After meeting Stephen Chesnowitz ("Chesnowitz") in an internet chat room, Williams began to solicit investors for Chesnowitz's hedge fund called ChartCandle also known as CCI Financial. Williams and Corporation initially solicited most of their investors by sending out mass mailings inviting recipients to free lunch seminars that offer a "gourmet meal" and the opportunity to "earn excellent returns with a guarantee against market risk." Exhibit A, attached hereto. After the seminar, Williams invited attendees to one-on-one meetings during which he offered and frequently sold interests in ChartCandle.

17. The ChartCandle offering material that Williams and Corporation gave to investors states in the "Risk Management" section:

The trader employs a number of methods in order to manage risk. Almost all trades are placed with stop and limit orders in place. In other words, the trader defines the maximum loss he will accept on any position when placing the trade. The information is placed with the broker when the position is opened. If any of the stop or limit is hit, the trade will automatically be closed by the broker without any

intervention from the trader.

In most cases the trader will only risk \$2,000 per day for every \$100,000 of fund value. Once the loss hits \$2,000 for the day, the trader stops trading for the day.

The fund manager's target is to return 3-4% per month for the fund after commission, but before management fees and bonuses. Volatility is expected to be low.

Exhibit B, attached hereto.

18. ChartCandle did not follow its own stop loss or limit order trading method. For example on April 28, 2006 alone, an account in the name of CCI Financial and Chesnowitz lost \$626,380 in unprofitable trades.¹ Exhibit C, Franklin G. Barlow Affidavit ("Barlow Aff.") ¶5, attached hereto. ChartCandle did not provide returns of 3-4% per month.

19. Contrary to the ChartCandle offering material's requirement that all investors be accredited, not all investors that Williams and Corporation sold ChartCandle investments to were accredited.

20. According to counsel for ChartCandle, ChartCandle also made investments in a Canadian bed and breakfast and two vintage cars. The offering materials for ChartCandle did not disclose that the funds would be used for investments in a bed and breakfast or vintage cars.

21. Between approximately June 2005 and May 2006, Williams sold to approximately 50 investors approximately \$3,970,000 worth of ChartCandle's limited partnership interests or promissory notes. Barlow Aff. ¶3.

22. ChartCandle paid Corporation at least \$322,000 for its sale of ChartCandle's

¹ The account started the day with a balance of \$876,330. Deposits were made of \$230,000. The account balance at the end of the day was \$479,950 - an apparent loss in excess of \$600,000.

promissory notes and limited partnership interests. Barlow Aff. ¶4.

23. Chesnowitz operated ChartCandle from Ontario, Canada. According to counsel for ChartCandle, ChartCandle incurred over \$1.5 million in trading losses, and has had \$900,000 frozen as part of the REFCO bankruptcy.²

24. During the summer of 2006, Chesnowitz sent letters to ChartCandle investors saying that he was winding down the operations of ChartCandle. Many of those investors believe that Williams rolled their investments in ChartCandle into LaJon Capital Fund, LP.

25. ChartCandle investors with internet access could log on to www.mychartcandle.com to receive monthly account statements for their investment in ChartCandle. The information posted on that website was false in that it showed that investors' principal was safe and that their investments were profitable, when, in fact, neither was true.

LaJon Capital Fund Offering

26. Williams represented to investors in the Fund that they would earn 20% a year on the investment and that their principal would be protected by hedge fund trading strategies.

27. Between April and December 2006, Williams sold to at least 90 investors \$5.9 million worth of limited partnership interests in the Fund. Most of the investors reside in Prince George's and Montgomery Counties. Barlow Aff. ¶3. Williams pooled investor money in a Bank of America account in the name of the Fund. Williams then transferred most of that money to Wroxton Fidelity SPC ("Wroxton"), a Cayman Islands company controlled by Chesnowitz.

28. The offering material the Fund specifically states that the "General Partner will not

² On October 17, 2005, Refco and 23 of its subsidiaries filed for bankruptcy. Based on the anticipated return to Refco creditors of 15 to 30 cents on the dollar, ChartCandle may receive back between \$135,000 and \$270,000 of the \$900,000 now-frozen as part of that bankruptcy.

generally have custody of the assets of the Partnership. The General Partner may only entrust the assets of the Partnership to managers and investee [sic] hedge funds that entrust assets to the custody of a brokerage firm which is a member of either the New York or American Stock Exchange, The Chicago Board Options Exchange, a United States bank or trust company...” Contrary to that representation, Williams had custody of those assets while they were deposited in the Bank of America account. Williams then invested the Fund assets in Wroxton that, in turn, invested most of the assets with Man Financial of Canada, a Canadian broker-dealer. Barlow Aff. ¶6. In addition, at least, \$1.5 million was wired from Wroxton to the Royal Bank of Canada, Grand Cayman on April 10, 2006.

29. The Fund offering material describes the investment strategy as a “multi-manager, multi-strategy partnership.” The offering material further states that “each manager will be allocated less than 15% of the Partnership’s net asset value” and that the “general partner expects that no more than 10% of the Partnership [funds] will be allocated to private equity funds, although the General Partner has no current intention of investing in private equity funds.” Williams, however, allocated management of all of the Fund’s capital to Chesnowitz and his private equity fund, Wroxton.

30. When Williams was subpoenaed by the Division for records relating to investments made by the Fund, he was unable to produce any records showing where the funds were held or who had custody of the funds. It appears that Williams made no effort to verify that the funds were actually being invested. The only documentation that Williams was able to produce was a fraudulent statement of the Fund’s alleged profits. Williams produced e-mails from Chesnowitz that claimed that the investments were profitable, thereby justifying Williams’ taking hundreds of thousands of dollars in fees. Williams never questioned the representations and produced no statements from any

brokerage firm showing profits.

31. Counsel for Wroxton and Chesnowitz and counsel for the defendants agree that most of the money invested through Williams was either lost through unsuccessful trading strategies, paid to Williams and his companies as commissions or performance fees, or returned to investors in redemptions.

32. On May 22, 2006, the Fund filed with the Division a securities exemption filing on a Form D, claiming an exemption under section 506 of the Securities Act of 1933. In that filing, the Fund represented that: (1) the Fund would be sold only to accredited investors; (2) that the minimum investment would be \$50,000; and (3) that no person would be paid commissions or similar remuneration for soliciting or selling interests in the Fund. Barlow Aff. ¶12.

33. Contrary to those representations, the Division's investigation has revealed that many investors invested less than the required \$50,000, many investors appear not to be accredited investors, and that several "marketing reps" were paid for their sales of interests in the Fund.

34. Williams has repeatedly attempted to mislead investors about Maryland's jurisdiction and its registration requirements. After the Division wrote to Williams on September 20, 2006, about possible unregistered investment advisory activity in Maryland, Williams began a campaign to evade the Division's jurisdiction. He arranged for investors, who had previously invested in the Fund while they were physically present in Maryland, to travel to New York in order to execute new subscription agreements in New York.

35. Williams made material omissions to mislead investors about whether Management was required to register as an investment adviser. The risk factors section of the private offering

memoranda for the Fund³ (the “Memos”) states that Management is not required to register with the Securities and Exchange Commission, but fails to inform investors that Management and Adviser are required to register as investment advisers or investment adviser representatives in Maryland.

36. Defendants fraudulently misrepresented the terms of the offering in the Memos. Specifically, the Memos stated that the offering had the following requirements: (1) a minimum investment of \$100,000; (2) that all investors be accredited; and (3) that each limited partner receive a financial statement audited by an independent accountant at the end of each calendar year and quarterly progress reports.

37. Like investors in ChartCandle, the Fund investors with internet access has access to monthly statements for their investment. The statements were false in that they showed profits instead of the near total loss of the funds invested.

38. The Memos also fraudulently mislead investors about performance fees charged for management of the Fund. The April Memo states in the Summary that the performance fee for Management will be 25%. Inconsistently, page 26 of the same Memo states that the performance fee will be 10%. The October Memo given to some investors after their investment raised the incentive fee to 50%. Investors who executed new subscription agreement after October 1, 2006, were not warned of the increase in the performance fee.

39. Without any legitimate basis, Williams and his companies were paid over \$586,000 in fees for the management of the Fund’s assets. Barlow Aff. ¶4. According to the terms of the offering, Adviser was entitled to 1% of assets under management per year, and Management was entitled to either 10%, 25% or 50% of profits as a performance fee depending on the Memo. At

³ There are two private offering memoranda dated April 1, 2006 and October 1, 2006.

most, Adviser was entitled to approximately \$32,000 as an asset under management fee. Management was not entitled to any performance fee because (1) the investments were not profitable and (2) Maryland law prohibits performance fees based on a period of less than one year. According to the Form D filing, no compensation was to be paid for the sale of the limited partnership interests.

40. Williams took fees after he knew that the money was gone. In a taped phone conversation with one of Chesnowitz's colleagues in late Fall 2006, Williams said "I understand that he [Chesnowitz] has lost the money...I can't tell them [the investors] that the only reason why is because we are under this investigation. If they get spooked..." Knowing that the money was gone, Williams continued to take fees from Wroxton, including \$50,000 on December 6, 2006 and \$12,000 on December 22, 2006. Nor did it stop him from selling, in December 2006, another \$140,000 worth of Fund investments.

COUNT I
(Offer and Sale of Unregistered Securities; Section 11-501)

The allegations contained in paragraphs 1 through 31 are realleged and incorporated by reference herein.

41. Corporation and Williams offered and sold investments in the form of promissory notes issued by and limited partnership interests in ChartCandle.

42. These investments are "securities" as defined in sections 11-101(r) of the Act both because they are notes and investment contracts.

43. Under section 11-501 of the Act and regulations promulgated thereunder, Code of Maryland Regulations ("COMAR") 02.02.03.01 *et seq.*, it is unlawful for any person to offer or sell in this State a security that is not registered as required by the Act unless the security or transaction

is exempt from registration under subtitle 6 of the Act or is a federal covered security.

44. The Division's files contain no record that the securities issued by ChartCandle are registered, as required by section 11-501 of the Act.

45. The Division's files contain no record that the defendants filed for the securities a notice of claim of exemption from the registration requirements of section 11-501 for ChartCandle.

46. The securities offered and sold by Williams and Corporation are not federal covered securities.

47. Williams and Corporation effected the offer and sale of securities in violation of the registration requirements of sections 11-501 *et seq.* of the Act.

COUNT II
(Offer and Sale of Securities by Unregistered
Broker-dealer and Unregistered Agents 11-401)

The allegations contained in paragraphs 1 through 38 are realleged and incorporated by reference herein.

48. Section 11-101(c) of the Act defines "broker-dealer" to include a person engaged in the business of effecting transactions in securities for the account of others or for his own account.

49. Section 11-101(n) of the Act defines "person" to mean an individual, a corporation, a partnership, an association, a joint-stock company, a trust where the interests of the beneficiaries are evidenced by a security, an unincorporated organization, a government, or a political subdivision of a government.

50. Section 11-401 of the Act makes it unlawful for any person to transact business in the offer or sale of securities in this state as a "broker-dealer" unless that person is registered

pursuant to the Act.

51. The Division's files contain no record that defendant companies were registered in this state as broker-dealers or that Williams was registered as a broker-dealer agent, pursuant to section 11-401 of the Act.

52. Defendants engaged in securities transactions in Maryland in violation of section 11-401 of the Act.

COUNT III
(Violation of the Antifraud Provisions; Section 11-301)

The allegations contained in paragraphs 1 through 43 of the Complaint are realleged and incorporated by reference herein.

53. Under section 11-301 of the Act, it is unlawful for any person, in connection with the offer, sale or purchase of any security, directly or indirectly to:

- (1) Employ any device, scheme or artifice to defraud;
- (2) Make any untrue statement of a material fact or omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; or
- (3) Engage in any act, practice, or course of business which operates or would operate as a fraud or deceit on any person.

54. Defendants Williams, Management, and the Fund have made untrue statements and omissions of material fact in connection with the offer and sale of securities, have employed a device, scheme or artifice to defraud, and have engaged in an act, practice or course of business which operates or would operate as a fraud and deceit.

55. Defendants Williams, Management, and the Fund knowingly, intentionally and to

investors' detriment, employed a device, scheme or artifice to defraud in violation of section 11-301(1) of the Act.

56. Defendants Williams, Management, and the Fund made misstatements of fact and omissions of material facts in violation of section 11-301(2) of the Act.

57. Defendants Williams, Management, and the Fund engaged in an act, practice or other course of business which operated as a fraud or deceit on investors in violation of sections 11-301(3) of the Act.

COUNT IV
(Investment Adviser Registration Violation; Section 11-401)

The allegations contained in paragraphs 1 through 48 of the Complaint are realleged and incorporated by reference herein.

58. Section 11-101(h)(1)(i) of the Act defines “investment adviser” to mean a person who, for compensation, engages in the business of advising others, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities.

59. Section 11-101(i) of the Act defines an “investment adviser representative” to include any person who solicits, offers or negotiates for the sale of or sells investment advisory services.

60. Section 11-401 of the Act makes it unlawful for any person to transact business in this State as an investment adviser or investment adviser representative unless that person is registered as such.

61. Defendants Williams, Management, and Adviser transacted business as an investment adviser in this State by advising clients regarding securities for compensation in the

State.

62. Defendants Williams, Management, and Adviser are not registered with the Division as an investment adviser or investment adviser representative in violation of Section 11-401 of the Act.

COUNT V

(Fraud in Investment Advisory Activities; Section 11-302(a) and COMAR 02.02.05.03)

The allegations contained in paragraphs 1 through 53 of the Complaint are realleged and incorporated by reference herein.

63. Section 11-302(a) of the Act makes it unlawful for any person who acts as an investment adviser under Section 11-101(h) of the Securities Act to:

- (1) employ any device, scheme or artifice to defraud;
- (2) engage in any act, practice or course of business which operates or would operate as a fraud or deceit on the other person;
- (3) engage in dishonest or unethical practices as the Commissioner may define by rule;

64. COMAR 02.02.05.03B provides that an investment adviser is a fiduciary and has a duty to act primarily for the benefit of its clients.

65. COMAR 02.02.05.03B(11) requires an investment adviser to disclose to clients in writing before any advice is rendered a material conflict of interest relating to the investment adviser that could reasonably be expected to impair the rendering of unbiased and objective advice.

66. Defendants Williams, Management, and Adviser employed a device, scheme or artifice to defraud by advising investors to buy the Fund's limited partnership interests without

properly and fully disclosing the fees that they would receive.

67. Defendants Williams, Management, and Adviser engaged in a course of conduct that operated as a fraud or deceit upon investor by converting the Fund's assets to his own use through the payment of unwarranted performance fees.

68. Defendants Williams, Management, and Adviser engaged in a dishonest and unethical practices by breaching their fiduciary duties as investment advisers to act in the best interest of investors by transferring over \$350,000 from the Fund to themselves between April 2006 and December 2006 when the fund was losing money and by failing to disclose a conflict of interest to investors in writing.

69. Defendants Williams, Management, and Adviser engaged in fraud in their investment advisory activities in violation of Section 11-302(a) of the Act and COMAR .02.02.05.03.

COUNT VI
(Fraud in Investment Advisory Activities; Section 11-302(c))

The allegations contained in paragraphs 1 through 60 of the Complaint are realleged and incorporated by reference herein.

70. Section 11-302(c) of the Act makes it unlawful for any person who acts as an investment adviser under Section 11-101(h) of the Act in dealings with advisory clients to knowingly make an untrue statement of material fact, or omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they are made not misleading.

71. Defendants Williams, Management, and Adviser made omissions of material fact

by failing to disclose conflicts of interest in writing and their lack of registration as investment advisers to clients while they were acting as investment advisers or investment adviser representatives.

72. Defendants Williams, Management, and Adviser engaged in fraud in their investment advisory activities in violation of Section 11-302(c) of the Act.

COUNT VII
(Violation of Performance Fees Prohibition; Section 11-302 and Regulation COMAR .02.02.05.08)

The allegations contained in paragraphs 1 through 63 of the Complaint are realleged and incorporated by reference herein.

73. Section 11-302(e) of the Act prohibits an investment adviser from being compensated on the basis of a share of capital gains except as permitted by rule or order of the Commissioner.

74. COMAR 02.02.05.08 exempts an investment adviser from Section 11-302(e) of the act if (1) the client is accredited, (2) the formulas upon which the fee is based is, among other things, on the performance of the client's account for a period of not less than 1 year, (3) the adviser discloses in writing that the fee arrangement may create an incentive for the investment adviser to make investments that involve more risk and are more speculative than would be the case in the absence of a performance-based fee, and (4) the investment adviser, and any investment adviser representative who enters into the contract, shall reasonably believe, immediately before entering into the contract, that the contract represents an arm's length arrangement between the parties and that the client, alone or together with the client's independent agent, understands the proposed method of compensation and its risks.

75. Defendants Williams and the Fund did not meet the requirements of COMAR 02.02.05.08 for an exemption to Section 11-302(e) of the Act.

76. Defendants Williams and the Fund charged over \$350,000 in performance fees based on an alleged share of capital gains in violation of Section 11-302(e) of the Act.

COUNT VIII
(False Filing; Section 11-303)

The allegations contained in paragraphs 1 through 67 are re-alleged and incorporated by reference herein.

77. Under section 11-303 of the Act, it is unlawful for any person to make or cause to be made, in any document filed with the Commissioner or in any proceeding under this title, any statement which is, at the time and in the light of the circumstances under which it is made, false or misleading in any material respect.

78. Defendants Williams and the Fund caused Form D to be filed with the Commissioner that was false as to (1) the amount that investors were required to invest, (2) the accredited status of investors, and (3) the compensation paid for selling the securities.

79. Defendants Williams and the Fund caused a false Form D to be filed with the Commissioner in violation of section 11-303.

PRAYER FOR RELIEF

The Commissioner respectfully requests that an Order be issued granting the following relief:

A. An injunction, containing findings of fact and conclusions of law, permanently restraining and enjoining all defendants and their officers, directors, agents, servants, employees,

successors and assigns and all persons in active concert or participation with them who receive actual notice of such Order by personal service or otherwise, from directly or indirectly engaging in acts and practices that violate sections 11-501, 11-401, 11-402, 11-301, 11-302 and 11-303 of the Act.

B. An injunction, containing findings of fact and conclusions of law, permanently restraining and enjoining all defendants and their officers, directors, agents, servants, employees, successors and assigns and all persons in active concert or participation with them who receive actual notice of such Order by personal service or otherwise, from receiving, investing, attempting to invest, transferring, or otherwise using or disbursing in any manner whatsoever, any funds or other assets of LaJon Corporation, LaJon Capital Fund LP, LaJon Capital Advisors, LLC, and LaJon Capital Management, LLC held on behalf of investors including, but not limited to, books, computers and records; assets in bank and brokerage accounts received directly or indirectly from investors or now being held on behalf of those investors by defendants, the corporate defendant's officers, directors, agents, servants, employees, successors and assigns, and any other person who received such fund or assets purchased with investor funds; except by transferring such funds or other assets to the plaintiff or receiver appointed in this proceeding.

C. An injunction, containing findings of fact and conclusions of law, permanently barring all defendants from transacting securities or investment advisory business for the account of others in this State.

D. An Order, containing findings of fact and conclusions of law, requiring all defendants and their officers, directors, agents, servants, employees, successors and assigns and all persons in active concert or participation with them who receive actual notice of such Order

by personal service or otherwise, to turn over to the receiver appointed in this proceeding all funds and other assets of or purchased with funds from LaJon Capital Fund LP, or held on behalf of LaJon Capital Fund LP, and its investors, including, but not limited to, books, computers and records, assets in bank and brokerage accounts received directly or indirectly from investors or now being held on behalf of those investors by defendants and the corporate defendants' officers, directors, agents, servants, employees, successors and assigns, and all real estate or any interest in real property now being held on behalf of those investors by defendants and the corporate defendant's officers, directors, agents, servants, employees, successors and assigns.

E. An Order, containing findings of fact and conclusions of law, requiring persons who received any goods, interests in real property or other assets paid for out of funds from LaJon Capital Fund, LP investors to turn over to the receiver appointed in this proceeding all such funds, interests in real property or other goods and assets, including but not limited to the following bank accounts held at Bank of America;

LaJon Capital Fund	0048 3278 9744
LaJon Capital Management	0048 3650 9645 0048 3278 9757
LaJon Corporation	0049 6172 8249
LaJon Corporation Tax Advisory Group	0049 6681 6499

F. An Order appointing a receiver for all defendants with all authority granted to a receiver under Title 13 of the Maryland Rules, Md. Code Ann. (2006) and specifically the authority immediately to identify, gather, receive, take control of, manage day-to-day, account to the Court for and liquidate LaJon Capital Fund LP, LaJon Corporation, LaJon Capital

Management, LLC and LaJon Capital Advisors, LLC assets and the right to file claims against any persons and entities responsible for any loss to investors or who received preferential payments or fraudulent conveyances from LaJon Capital Fund LP.

G. An Order freezing LaJon Capital Fund LP, LaJon Corporation, LaJon Capital Management, LLC and LaJon Capital Advisors, LLC 's assets, wherever located, subject to the administration of a receiver, until further order of this Court.

H. An Order staying all other actions against LaJon Capital Fund LP, LaJon Corporation, LaJon Capital Management, LLC and LaJon Capital Advisors, LLC and the receiver, until further order of this Court.

I. An Order requiring Williams to provide an accounting within 5 days setting forth the identity and location of all goods, services and assets purchased with LaJon Capital Fund, LP funds.

J. An Order waiving any requirement that plaintiff or the receiver post a bond in this matter.

K. An Order, containing findings of fact and conclusions of law, requiring all defendants to make restitution to all investors in LaJon Capital Fund, LP and ChartCandle, Inc or the ChartCandle Fund.

K. An Order, containing findings of fact and conclusions of law, requiring all defendants to disgorge payments made to Williams, Adviser, Corporation and Management.

L. An Order, containing findings of fact and conclusions of law, requiring defendants to pay civil monetary penalties of up to \$5,000 per violation of the Act.

M. Such other and further equitable relief as this Court may find just and appropriate.

Respectfully submitted,
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Dated: February 20, 2007